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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

28 TRISHA WREN and CYNTHIA PIPER, et
al., individually and on behalf of others
similarly situated,

Case No. 3:06-cv-05778 JCS
Case No. 3:07-cv-00032 JCS

CLASS AND COLLECTIVE ACTION

29 Plaintiffs,
vs.
30 RGIS Inventory Specialists, LLC, RGIS, LLC,
31 and Does 1-25 Inclusive,

STIPULATION AND [proposed] ORDER
RE BRIEFING AND HEARING
SCHEDULE ON MOTION TO
FACILITATE NOTICE

32 Defendants.

Date: November 9, 2007
Time: 9:30 a.m.
Place: Courtroom A, 15th Floor
The Honorable Magistrate Judge Spero

1 On October 19, 2007 the Court held a hearing concerning the parties joint submission
2 regarding discovery issues filed on October 4, 2007 relating to the contact information and
3 depositions of the employee declarants submitted by Defendant in connection with its opposition
4 to Plaintiffs' Motion to Facilitate Notice. In view of the Court's order granting Plaintiffs the right
5 to contact and conduct discovery regarding an additional sample of twenty of these declarants, it is
6 hereby stipulated by and between the parties through their counsel of record that the briefing and
7 hearing schedule on the pending motion be modified as follows:

- 8 1.) The Court has ordered Plaintiffs to provide Defendant with a selection of twenty
9 employees from the group of declarants by no later than Monday, October 22, 2007.
10 The Court has ordered Defendant to provide Plaintiffs with the most recent contact
11 information of the sample of twenty employee declarants by Tuesday, October 23,
12 2007. Plaintiffs shall conduct discovery regarding these witnesses during the period
13 between October 23, 2007 and November 6, 2007. The parties shall meet and confer
14 to determine a reasonable number of depositions of this group of witnesses.
- 15 2.) Defendant shall provide Plaintiffs with the most recent contact information for Mike
16 Baca, Robert Hayes and Kory Johnson by no later than October 22. Plaintiffs shall
17 serve subpoenas upon these individuals promptly. If RGIS decides not to produce
18 the contact information of Mr. Johnson it can, in the alternative, inform Plaintiffs
19 that it is withdrawing his declaration.
- 20 3.) Plaintiffs shall file their reply papers by no later than November 6, 2007.
- 21 4.) Defendants may file a sur-reply of no more than ten pages in length by no later than
22 November 13, 2007 to address new evidence presented by Plaintiffs.
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5.) The hearing on the Motion to Facilitate Notice is re-set for November 30, 2007 at 9:30 a.m., or the Court's first available hearing date thereafter, December 14 at 9:30 am. 2007.

IT IS SO STIPULATED.

Dated: October 19, 2007

SCHNEIDER & WALLACE

DRINKER, BIDDLE & REATH LLP

By: _____ /s/
Guy B. Wallace
Counsel for Plaintiffs

ORDER

Pursuant to stipulation, and good cause appearing, IT IS SO ORDERED

Dated: October 22, 2007

